

LEWIS JOHS
Lewis Johs Avallone Aviles, LLP

Counsellors at Law

October 17, 2025

Via ECF

Magistrate Judge Steven I. Locke
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Jennifer Guilmette v. Bliss Restaurant Bar & Catering, Inc., et al.
Case No.: 25-cv-02395-RER-SIL
LJAA File No.: 0153.1930.0000

Dear Judge Locke:

We represent the defendants, Bliss Restaurant Bar & Catering, Inc. and Ronald Hoffman, in connection with the above-referenced action. We write pursuant to section 2(B) of your individual practice rules to request an extension of defendants' time to respond to plaintiff's motion for conditional certification under the FLSA that was filed on October 6, 2025 and to stay all discovery deadlines pending a conference call with the Court.

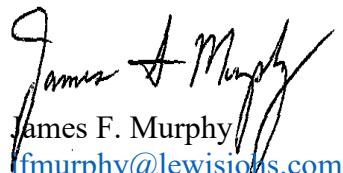
I have attempted to contact my client several times before and after the filing of Plaintiff's motion by phone and email to discuss a response to the motion and the status of Defendants' discovery responses.

I have been unable to contact my client. I learned recently why my client has been unable to respond to me and request that the Court schedule a conference call so that I might explain the reason as opposed to disclosing what would be sensitive personal information through a public Electronic Case Filing.

I spoke by phone with Garret Kaske, the attorney for Plaintiff, and explained the current situation and that I would be writing a letter to the Court to request a telephone conference to discuss the case. As a result, Defendants request that a conference call be scheduled at the Court's convenience with counsel to discuss the current status of this case.

I thank the Court for its continued attention to this matter.

Respectfully submitted,


James F. Murphy
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JFM/mh

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cc: *Via ECF*
Counsel of Record